

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Criminal No. 04-10336-NMG
	)	
v.	)	VIOLATIONS:
	)	
1. JULIO CARRION SANTIAGO,	)	21 U.S.C. §846--
2. PEDRO ALBERTO MIRANDA,	)	Conspiracy to Distribute
a/k/a "TAVO", a/k/a	)	Heroin (Count 1)
Carlos Colon,	)	
3. REYNALDO RIVERA, a/k/a	)	21 U.S.C. §841(a)(1)--
"REY",	)	Distribution of Heroin
4. ENRIQUE AGOSTO,	)	and Aiding and Abetting Same
5. JOSE TORRADO,	)	(Counts II-VI)
6. CARLOS SANCHEZ,	)	
7. LUIS R. SANCHEZ, a/k/a	)	18 U.S.C. §924(c)--
"PITO",	)	Possession of a Firearm in
8. EDWIN TORREZ, a/k/a	)	Furtherance of a Drug
"COQUI",	)	Trafficking Crime
9. JOSE O. RODRIGUEZ,	)	(Cunt VII)
10. ZULEIMA REYES, a/k/a	)	
"LINDA",	)	26 U.S.C. §5861(d)--
11. SANTIAGO ARROYO, and	)	Possession of Unregistered
12. JUAN NUNEZ,	)	Firearms (Count VIII)
Defendants.	)	
	)	21 U.S.C. §853--
	)	Criminal Forfeiture

**UNITED STATES' BILL OF PARTICULARS**  
**FOR FORFEITURE OF ASSETS**

The United States of America, by and through its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

1. The Forfeiture Allegation of the Superseding Indictment seeks the forfeiture, pursuant to 21 U.S.C. § 853, and as a result of the offenses alleged in Counts I through VI of the Superseding Indictment, of any and all property constituting, or

derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations, including without limitation:

- a. \$6,200 in United States currency seized from 270 Fairmont Street, Apartment 1F, Fitchburg, Massachusetts, on October 15, 2004;
- b. \$3,200 in United States currency seized from 235 Eighteenth Street, Apartment 204, Dracut, Massachusetts, on October 15, 2004;
- c. One blue 1994 Plymouth Voyager minivan, VIN 2P4GH45R5RR796331 bearing Massachusetts registration 5133XA, registered to SANTIAGO, seized in Brooklyn, New York, on October 15, 2004; and
- d. One black 1999 GMC Yukon bearing Massachusetts, VIN 1GKEK13R4XJ766046, registration plate 4740YR, registered to RIVERA, seized from 235 Eighteenth Street, Dracut, Massachusetts, on October 15, 2004.

2. In addition to the above-named assets, the United States intends to forfeit the following vehicle, based on the Forfeiture Allegation of the Superseding Indictment:

- e. One Gray 2004 Toyota Matrix, Vehicle Identification No. 2T1KY32E54C212352, and Massachusetts Registration No. 44HR35, registered in the name of Harry Medina, and seized from 22 Baldwin Street, Lowell, Massachusetts on June 28, 2005.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Kristina E. Barclay  
WILLIAM F. BLOOMER  
KRISTINA E. BARCLAY  
Assistant U.S. Attorneys  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3100

Dated: October 13, 2005

#### CERTIFICATE OF SERVICE

I, Kristina E. Barclay, Assistant U.S. Attorney, hereby certify that a true copy of the foregoing Bill of Particulars for Forfeiture of Assets was served upon P. Scott Bratton, Esquire, Bratton & Springer, LLP, Nine Middlesex Street, Lowell, Massachusetts 01852, as counsel for Claimant Harry Medina, and was also served upon Carl N. Donaldson, Esquire, 11 Beacon Street, Suite 600, Boston, Massachusetts 02108, as counsel for Defendant Reynaldo Rivera, and Lenore Glaser, Esquire, 25 Kingston Street, 6th Floor, Boston, Massachusetts 02111, as counsel for Defendant Jose Torrado, by first class mail, postage prepaid.

/s/ Kristina E. Barclay  
Kristina E. Barclay  
Assistant U.S. Attorney

Dated: October 13, 2005